


**From:** [Martin Reineman](#)  
**To:** [Linc Wehrly](#)  
**Cc:** [Stephen Healy](#)  
**Subject:** Re: Fw: Diesel certification  
**Date:** 09/05/2007 10:24 AM

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Mercedes also does not have a CO2 adjustment factor.

▼ [Stephen Healy/AA/USEPA/US](#)

**Stephen  
Healy/AA/USEPA/US**  
EPA-OAR,OTAQ,CISD

To: [Linc Wehrly/AA/USEPA/US@EPA](#)  
cc: [Martin Reineman/AA/USEPA/US@EPA](#)  
Subject: Re: Fw: Diesel certification 

Received Date:  
09/04/2007 02:46 PM  
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Cummins does not have an adjustment factor for CO2. The other adjustment factors are:

NOx = 0.0494 g/mi

CO = 0.001 g/mi

NMHC = -0.0001 g/mi

PM = 0.000 g/mi

▼ [Linc Wehrly/AA/USEPA/US](#)

**Linc  
Wehrly/AA/USEPA/US**  
EPA-OAR,OTAQ,CISD  
Sent by: Linc Wehrly

To: [Stephen Healy/AA/USEPA/US@EPA](#), [Martin Reineman/AA/USEPA/US@EPA](#)  
cc:

Subject: Fw: Diesel certification

Received Date:  
09/04/2007 02:21 PM  
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09/04/2007 02:21:18 PM

Steve/Marty,

Per the request in the message below, could you each tell me what the final regeneration adjustment factors were for the Cummins and the Mercedes E320, so that I can pass it on to Matt Brusstar.

Thanks,  
Linc

Linc Wehrly  
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Compliance and Innovative Strategies Division  
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----- Forwarded by Linc Wehrly/AA/USEPA/US on 09/04/2007 02:18 PM -----

**Matt**

**Brusstar/AA/USEPA/US**

EPA-OAR,OTAQ,ATD

Sent by: Matt Brusstar

To Linc Wehrly/AA/USEPA/US@EPA

cc Ben Ellies/AA/USEPA/US@EPA

Subject Diesel certification

Received Date:

09/04/2007 02:15 PM

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Linc,

We're in the process of doing the vehicle CO2 emissions simulation work with Ricardo, and we're including some diesel simulations as part of it. In order to account for aftertreatment regeneration/desulfation in the EASY-5 model, Ricardo is simply applying a fuel penalty at the end.

I was wondering how this compared with any LD cert data for diesels that we have generated. How is the fuel penalty accounted for, given that the regen schedule isn't so regular that the FTP would always accurately capture it? Is there a factor similar to the one that Ricardo is using for their models that is applied to the measured fuel?

Matt.